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16 [Additional counsel listed on following page]

17
18 **IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19
20 Daniel Saldaña,
21 Plaintiff,
22
23 v.
24 Martha Donovan, et al.,
25 Defendants.

Case No. 2:24-CV-00895-DSF-AJR

Hon. Dale S. Fischer

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28 **PLAINTIFF'S AND DEFENDANTS
MARTHA DONOVAN, IN HER
CAPACITY AS SUCCESSOR IN
INTEREST TO MICHAEL
DONOVAN, AND LEONARD
MAUGHAN'S NOTICE OF
SETTLEMENT**

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19 *Attorneys for Defendants Martha Donovan, in her capacity as successor in interest*
20 *to Michael Donovan, and Leonard Maughan*

21 **PLAINTIFF'S AND DEFENDANTS MARTHA DONOVAN, IN HER**
CAPACITY AS SUCCESSOR IN INTEREST TO MICHAEL DONOVAN,
AND LEONARD MAUGHAN'S NOTICE OF SETTLEMENT

22 It is hereby stipulated and agreed by and between Plaintiff Daniel Saldaña,
23 through his counsel of record, Nick Brustein, Anna Benevenutti Hoffmann, Amelia
Green, Annie Sloan, Grace Paras, Michael Romano, Susan Champion, Michael
Freedman, and Ashwini Mate, and for Defendants Martha Donovan, in her
capacity as successor in interest to Michael Donovan, and Leonard Maughan
through their counsel of record, Geoffrey Plowden and Mildred K. O'Linn, that:

1. On November 7, 2025, Plaintiff Daniel Saldaña and Defendants Martha
2 Donovan, in her capacity as successor in interest to Michael Donovan,
3 and Leonard Maughan (the “BPPD Defendants”) reached a settlement
4 agreement in the above-captioned matter. As part of this settlement, the
5 BPPD Defendants only will be dismissed, with prejudice, as parties to
6 this action. The parties anticipate filing a stipulation for dismissal with
7 prejudice in mid-December 2025. Pursuant to the terms of the parties’
8 agreement, filing of the stipulation is contingent on the BPPD
9 Defendants’ payment of the first settlement installation to Plaintiff, which
10 is expected in the first half of December 2025.
12. Because this settlement agreement provides a final resolution to
13 Plaintiff’s claims against the BPPD Defendants, Plaintiff no longer
14 requests that the Court schedule this matter for trial as against the BPPD
15 Defendants.
17. The settlement entered into by Plaintiff and the BPPD Defendants does
18 not affect Plaintiff’s ongoing claims against Defendants Brian Roberts or
19 Keith Stanton (the “BPH Defendants”), which are in the summary-
20 judgment stage of litigation. Plaintiff continues to seek dates for trial as
21 against the BPH Defendants. Further, the settlement entered into by

1 Plaintiff and the BPPD Defendants does not affect the tentative
2 settlement entered into by Plaintiff and Defendants Steven Sowders and
3 County of Los Angeles (the “County Defendants”), which is pending
4 approval by the County. Plaintiff and the BPPD Defendants do not seek
5 to stay any deadlines or litigation with respect to Plaintiff’s claims
6 against the BPH Defendants and/or the County Defendants.

7 Dated: November 11, 2025
8

9 /s/ Amelia Green

10 NICK BRUSTIN
11 ANNA BENEVENUTTI HOFFMANN
12 AMELIA GREEN
13 ANNIE SLOAN
14 GRACE PARAS
15 **Neufeld Scheck Brustin Hoffmann
& Freudenberger, LLP**

16 MICHAEL ROMANO
17 SUSAN CHAMPION
18 **Stanford Law School’s
Three Strikes Project**

19 MICHAEL G. FREEDMAN
20 ASHWINI MATE
21 **The Freedman Firm PC**

22 *Attorneys for Plaintiff*

23 /s/ Geoffrey Plowden

24 Geoffrey Plowden

1 Mildred K. O'Linn
2

3 **Manning Kass**
4

5 *Attorneys for Defendants Martha*
6 *Donovan, in her capacity as*
7 *successor in interest to Michael*
8 *Donovan, and Leonard Maughan*
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CERTIFICATE OF SERVICE

I, Isis Arevalo, certify that a true and accurate copy of Plaintiff's and Defendants Martha Donovan, in her Capacity as Successor in Interest to Michael Donovan, and Leonard Maughan's Notice of Settlement was electronically filed with the Clerk of the Court via the ECF system, which will send notification of such filing to all attorneys of record, and serve a copy of the same filing via electronic mail to:

Geoffrey Plowden
Mildred K. O'Linn
Manning Kass
*Attorneys for Defendants Martha
Donovan, in her capacity as
successor in interest to Michael
Donovan, and Leonard Maughan*

Andrew Baum
James Sargent
Glaser Weil
*Attorneys for Defendants Los Angeles
County and Steven Sowders*

Ryan Gille
Cassandra Shryock
Christian Georgely
Hannah Park
**State of California Attorney
General's Office**
*Attorneys for Defendants Brian
Roberts and Keith Stanton*

Dated: November 11, 2025
New York, NY

/s/ Isis Arevalo
Isis Arevalo
Paralegal for Plaintiff